



INDIANA
DEPARTMENT *of*
EDUCATION

**USDA FOODS
DISASTER, HOLDS,
AND RECALLS
RECIPIENT
AGENCY
GUIDE**



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Introduction

This guide provides information regarding the procedures during a U.S. Department of Agriculture (USDA) Foods recall, hold, disaster, or presidential declaration.

The USDA purchases food to support the American agricultural market. These food products are called USDA Foods. These USDA Foods are then offered to recipient agencies (RA).

USDA Foods account for approximately 20% of the food used in schools; the remaining 80% is purchased by the RA from the commercial market. The USDA Foods supply is among the safest in the world. However, the USDA has established recall procedures for purchased USDA Foods, in the event of a food safety issue or concern.

Indiana Department of Education (IDOE) *USDA Foods Disaster, Holds & Recall Recipient Agency Guide* includes information regarding the general process and communication involved in the recall of USDA Foods. It also includes forms and documentation specific to the Indiana USDA Foods Program.



Disaster

Food Distribution Program regulations at 7 CFR 250.69 (Disasters)
and 7 CFR 250.70 (Situations of distress)

Declarations

- **Presidential Disaster Declarations**

- Any natural catastrophe (including any hurricane, tornado, storm, high water, wind driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, or drought), or, regardless of cause, any fire, flood, or explosion, in any part of the United States, which in the determination of the President causes damage of sufficient severity and magnitude to warrant major disaster assistance under the Stafford Act to supplement the efforts and available resources of states, local governments, and disaster relief organizations in alleviating the damage, loss, hardship, or suffering caused thereby.
- Full range of long-term federal assistance programs for individual assistance to families who have sustained losses.
- Based on Federal Emergency Management Agency (FEMA) feedback, evaluations and recommendations.
- Enables resources to be put into place for certain designated areas.
- In instances in which the President has declared a disaster and Food and Nutrition Service (FNS) has determined that, as a result of the disaster, low-income households are unable to purchase adequate amounts of nutritious food, disaster organizations may be eligible to receive donated foods by making application through State Distributing Agencies (SDA) for congregate meal service or household distribution to disaster victims.

- **Emergency Declarations**

- Any occasion or instance for which, in the determination of the President, federal assistance is needed to supplement state and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States
- More limited than disaster declaration
- These have less or no federal recovery programs



Distress

- **Situation of Distress:**
 - A natural catastrophe or other situation that has not been declared a disaster or emergency by the President, but in the determination of the Distributing Agency or FNS, warrants the use of USDA Foods to assist survivors of such a catastrophe or other event. Situations of distress may include a hurricane, tornado, flood, snowstorm, or explosion.
 - For situations of distress caused by a natural event, the SDA has authority to make USDA Foods available for congregate feeding for a period of up to 30 days without prior FNS approval. The SDA must request approval from FNS Headquarters, through the regional office, to exceed 30 days.
 - When a situation of distress is not caused by a natural event, FNS Headquarters must approve initiation of USDA Foods assistance and its duration.

Assistance After Disaster

- **Congregate Feeding**
 - During a major disaster, emergency, or situation of distress, distributing agencies can provide USDA Foods from current program inventories to disaster organizations for use in providing congregate meals in large quantities in group settings. Congregate feeding is typically provided in the immediate aftermath of a disaster when grocery stores may be closed and/or when people are staying in shelters. Congregate meals are served in a central location, such as schools, churches, community centers, or mobile kitchens. Additional information on congregate feeding using USDA Foods is provided throughout this manual.
 - In instances when it is determined that donated foods are needed for preparing meals for congregate meal service, SDAs can make donated foods available to disaster organizations upon request. Disaster organizations must provide the following information to the SDA:

Required Information for a Disaster Feeding Organization's Application for Use of USDA Foods for Congregate Feeding
<ul style="list-style-type: none">● A description of the disaster situation.● The number of individuals requiring meals.● The period of time for which meals are being requested.● The quantity and types of food needed.● The number and location of sites providing meals (to the extent that information is known).



Holds & Recalls

Holds

- Process is used when a food safety issue is raised about a USDA Foods.
- A food hold is put in place at the start of a recall.
- Inform all employees of the USDA Foods recall.
- All recalled food should be put in one place away from all other inventory.
- Make sure this does not get put into production by labeling “DO NOT USE.”
- Once a recall determination has been made the RA should follow the normal recall steps.

Recall

- A food recall is a situation that occurs when a food producer takes the product off the market because there is a reason to believe that it may cause illness or injury.
- A food recall may happen for many reasons:
 - Discovery of organisms, including bacteria or parasites.
 - Discovery of foreign objects such as broken glass or metal.
 - Discovery of a major allergen that does not appear on the product label.
 - Mislabeled packaging.
 - Outbreaks, epidemics, and pandemics.

Types of Recalls

Class	Definition	Examples
Class I	A health hazard situation where there is a reasonable probability that eating the food will cause serious, adverse health consequences, or death.	<i>E. coli</i> O157:H7 in ground beef; <i>Salmonella</i> in peanut butter; Food with an undeclared allergen
Class II	A health hazard situation where there is a remote probability of adverse health consequences from eating the food.	Product containing a foreign material
Class III	A situation where eating the food will not cause adverse health consequences.	Minor labeling problems, such as improper format or undeclared ingredients that are not allergens



Recall Roles and Responsibilities

The purchase and distribution of USDA Foods is a collaborative partnership among federal agencies, SDAs, and RAs, as well as processors and distributors. All have important roles and responsibilities for USDA Foods in accordance with 7 CFR Part 250, and FNS regulations and policies.

Recipient Agency (RA) Responsibilities

- Each RA has the responsibility to:
 - Have recall procedures in place.
 - Implement the recall procedures upon notification of a recall of USDA Foods.
 - Assign a food safety coordinator and alternate, and provide the names, titles, email addresses, and telephone and fax numbers of the coordinator and alternate to the SDA.
 - Maintain a contact list for RA serving sites, distributors, and other recipients. This list should have two recall contacts per site and be verified annually.
 - Notify all sites about the recall immediately, ideally in 24 hours or less, and ensure that the affected products are isolated and labeled “Do Not Use” to avoid accidental use.
 - Identify the locations of the affected products and verify that the products have the correct product identification codes.
 - Contact further processors to track redirected food affected by the recall.
 - Conduct an inventory assessment, ideally in 48 hours or less, of affected product:
 - Served
 - Remaining in-stock at schools, warehouses, and distributors
 - Further distributed to program participants
 - Redirected for further processing.
 - Submit the inventory assessment information to the SDA.
 - Follow applicable destruction/disposal instructions provided by the SDA.

RA Recall Process

Prior to recall announcement

- RAs must have recall procedures in place.
 - All RA staff should be aware of and trained in recall procedures.
 - A food safety coordinator and an alternate must be assigned.
 - Provide their name, title, and contact information to IDOE’s Food Distribution Team.
 - Contact information should be provided for 24-hour access for speedy notification.
 - A list of RA sites, distributors and other recipients must be maintained and easily accessible.



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- It must be possible to trace recalled food to the final recipient.

Recall has been announced.

Step 1

- a. Notify all school sites about the recall immediately.
- b. Provide the product code and description in order to track the USDA Foods recalled.
- c. Provide instructions for handling and disposal of the affected food as directed by IDOE.

Step 2

- a. Find and isolate the affected product and label “DO NOT USE” to avoid accidental use.
- b. Conduct an inventory assessment of the affected product within 48 hours or less.
- c. Check the amount of product on hand, at the state warehouse, and at the processors.

Step 3

- a. Submit the inventory assessment to IDOE by the allotted deadline.
- b. Follow IDOE’s instructions for storage, destruction, and disposal.

After a recall

- It is strongly recommended that schools conduct or participate in an after-action meeting.
 - This is the time to debrief about what took place, why it happened the way it did, and how can it be improved?
 - These questions should be answered:
 - What was supposed to happen?
 - What was the reality?
 - What went well?
 - What did not go well?
 - What should be changed for next time?
- If you've already prepared a recalled food item in your kitchen or still have it in your refrigerator, it's important to throw out the food and clean your kitchen.
 - Wash all cookware and utensils (including cutting boards) with hot soapy water.
 - Clear off counters and refrigerator drawers and shelves and wash them with hot soapy water.
 - Then wipe any surfaces, shelves, or drawers and rinse dishes and cookware with a sanitizing solution and let them air dry. You can use a diluted bleach solution (1 TBSP unscented, liquid chlorine bleach in 1 gallon of water).
 - Products recalled due to an undeclared allergen may be a risk for anyone in your school with an allergy to that substance.



Reporting & Reimbursement

Recordkeeping is important and required.

On October 31, 1998, Congress enacted Public Law 105-336, the William F. Goodling Child Nutrition Reauthorization Act of 1998 (the Act).

Section 15 of the Act authorizes the Secretary of Agriculture to reimburse costs associated with USDA Foods, if the Secretary determines that the USDA Foods pose a health or safety risk. The law stipulates that reimbursable costs for USDA Foods are limited to:

- Storage
- Transportation
- Processing
- Distribution

It is important to note that no two recalls are alike. In the event of a recall of USDA Foods, IDOE will work closely with the USDA to determine allowable costs for reimbursement.

Reimbursable expenses may include:

- a. Delivery fees.
- b. Storage fees.
- c. Processing fees.
- d. Destruction costs

Non-reimbursable expenses include, but are not limited to:

- a. Storage at the school level.
- b. Overtime compensation for employees in conducting the recall.
- c. Other associated administrative expenses.
- d. Reimbursement for commercially purchased food used in place of the recalled product.



Recipient Agency Recall Checklist



Recipient Agencies (RA): Agencies authorized to receive USDA Foods for distribution to eligible recipients, for use in meals served to eligible recipients, or for distribution to other recipient agencies in accordance with an agreement with a State Distributing Agency. A School Food Authority is an example of a RA.

Prior to a recall

- Have up to date contact information for every site RA is responsible for.
- Have recall procedures in place.
- Ensure all Recipient Agency (RA) staff is aware of, and trained, in recall procedures.
- Assign a food safety coordinator and an alternate. Ensure their name, title, and contact information is provided to the State Distributing Agency (SDA). Contact information should be provided for 24-hour access to speed the notification process.
- If the RA further distributes food, maintain a contact list for RA serving sites, distributors, and other recipients. It must be possible to trace recalled food to the final recipient.

Upon notification of a recall

- If the RA further distributes food, notify all sites about the recall as soon as possible. To the extent possible, RAs should confirm receipt of the notification by sites to ensure the message was received and understood.
 - Be sure to provide product identification information needed by sites to track the product.
 - Provide instructions on handling the affected food as directed by the SDA.
 - Provide specific product disposal instructions if directed by the SDA.
- Find and isolate the affected product and label “DO NOT USE” to avoid accidental use.
- Conduct an inventory assessment, ideally in 48 hours or less, of affected product:
 - Amount remaining in stock and location (school, warehouse, distributor).
 - Further distributed to program participants.
 - Redirected for further processing.
- Submit the inventory assessment information to the SDA within the directed timeframe.
- Follow applicable storage/destruction/disposal instructions provided by the SDA.

After a Recall

- Conduct, or participate in, an “after-action” meeting to discuss what went right and lessons learned.



Recall Destruction Form

Information to Verify Destruction of Recalled USDA Foods

School Food Authority Name _____

Recipient Agency Number _____

USDA FOODS NAME & NUMBER	# OF CASES DESTROYED	DESTRUCTION METHOD

WITNESSES	PRINT NAME	SIGNATURE	DATE DESTRUCTION OBSERVED
WITNESS #1			
WITNESS #2			

School Food Authority Contact Information:

Name and Title _____

Address _____

—

Phone Number _____

PLEASE REMEMBER ALL USDA MARKINGS MUST BE REMOVED



IDOE USDA Foods Contact List

Contact Name:	Phone:	Email:
Julie Sutton - School and Community Nutrition Director	317-232-0845	jsutton@doe.in.gov
Christina Herzog- Assistant Director- Operations & FDP	317-232-0872	cherzog@doe.in.gov
Linda Smith -FDP Specialist	317-232-0859	lsmith@doe.in.gov
Cheryl Moore- FDP Specialist	317-234-2516	cmoore@doe.in.gov
Brian Lafayette- FDP Inventory Specialist	317-233-9291	blafayette@doe.in.gov

Resources

- [USDA Foods Program Disaster Manual](#)
- [Responding to Food Recall Procedures for Recalls of USDA Foods](#)
- **FD-066:** [Continuation of USDA Foods Assistance During a Human Pandemic \(Revised\)](#)
- **FD-093:** [Questions and Answers about Disaster Policies and Procedures \(Revised\)](#)
- **FD-109:** [Consolidation of Reporting Requirements and Replacement of Donated Foods in Disasters, Emergencies, and Situations of Distress](#)
- **FD-139:** [Clarification on Inventory Protection Requirements](#)
- [Understanding FSIS Food Recalls](#)
- [Recalls & Public Health Alerts](#)
- [FDA Recalls, Market Withdrawals, & Safety Alerts](#)
- [Food Safety Recalls and Outbreaks](#)